

Boston Brussels Chicago Düsseldorf London Los Angeles Miami Milan Munich New York Orange County Rome San Diego Silicon Valley Washington, D.C. Christine M. Gill Attorney at Law cgill@mwe.com 202.756.8283

October 4, 2005

Filed Electronically

Marlene H. Dortch Secretary Federal Communications Commission Office of the Secretary 445 Twelfth Street, S.W. Washington, D.C. 20554

Re: Notice of Ex Parte Presentation and Ex Parte Submission; CC Docket No. 94-102

Dear Ms. Dortch:

On October 3, 2005, David Rines of McDermott Will & Emery, LLP, on behalf of Southern Communications Services, Inc. d/b/a SouthernLINC Wireless ("SouthernLINC Wireless"), spoke by telephone with Jeffrey Cohen of the Public Safety and Critical Infrastructure Division of the Wireless Telecommunications Bureau regarding SouthernLINC Wireless's request of July 26, 2005, for a limited waiver of Section 20.18(g)(1)(v) of the Commission's Rules, 47 C.F.R. § 20.18(g)(1)(v), regarding the deadline for achieving ninety-five percent penetration of automatic location identification (ALI)-capable handsets among its subscribers. Specifically, Mr. Rines and Mr. Cohen discussed the additional materials submitted to the Commission as part of SouthernLINC Wireless's September 28, 2005, *ex parte* submission in this docket.

In addition, SouthernLINC Wireless hereby provides another letter from the representative of one of the Public Safety Answering Points (PSAPs) located in SouthernLINC Wireless's service territory regarding SouthernLINC Wireless's waiver request. SouthernLINC Wireless requests that this letter, along with those submitted with its September 28, 2005, *ex parte* filing, be included in the record and taken into consideration by the Commission as it reviews SouthernLINC Wireless's waiver request.

In accordance with the Commission's rules, one copy of this *ex parte* notice and submission is being filed electronically for inclusion in the record of the above-referenced proceeding.

Yery truly yours,

Christine M. Gill

Marlene H. Dortch October 4, 2005 Page 2

cc: Michael Wilhelm

Jeffrey Cohen Cathy Seidel Nicole McGinnis

Att.

DEPARTMENT OF PUBLIC SAFETY 911 Communications * Emergency Management * EMS

"We protect the health, safety, and welfare of our community with pride and professionalism!"

September 30, 2005

Martene Dortch, Esq. Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: E9-1-1 Implementation; SouthernLINC Wireless Request for Waiver

Dear Ms. Dortch:

Okaloosa County E9-1-1 provides citizens of our community with E9-1-1 Wireless Phase I and Phase II service. We work with the wireless carriers in our area to insure prompt implementation of these services to better serve our citizens. As explained below, we believe that SouthernLINC Wireless' request for a waiver of the FCC's handset deployment deadline is appropriate.

We have worked with SouthernLINC Wireless throughout this process, and they have given us effective and timely assistance in all of our deployment efforts. SouthernLINC Wireless has demonstrated the kind of proactive involvement, spirit of partnership and cooperation that is needed to bring E9-1-1 services to the public as promptly as possible. SouthernLINC Wireless informed us last summer of a problem that had just been discovered in the software of its new A-GPS handsets that affected the ability of these handsets to provide E9-1-1 location information. SouthernLINC Wireless informed us of the steps taken to ensure that customers would still be able to make 9-1-1 calls and of the efforts that are being taken to correct the A-GPS software problem so that these handsets will again be location-capable.

We understand SouthernLINC Wireless has formally requested a waiver of the FCC's December 31, 2005, deadline for achieving minety-five percent penetration of location-capable handsets. Based on the level of effort SouthernLINC Wireless has already devoted to E9-1-1, we are confident that it will do everything it can to migrate as many of its customers as possible to location-capable handsets. Therefore, we believe that SouthernLINC Wireless's request for a waiver of the FCC's handset deployment deadline is appropriate.

Very truly yours,

Robin Etienne 911 Coordinator

1250 N. Eglia Parkway, Suite G118, Shalimar, FL 32579
Phone: (850) 689-5606/Fax: (850) 689-5670
retienne@co.okalgosa.fl.us